

EXHIBIT B

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE GOOGLE DIGITAL ADVERTISING
ANTITRUST LITIGATION

No. 21-MD-3010 (PKC)

This Document Relates to:
ALL ACTIONS

**DECLARATION OF [REDACTED] IN SUPPORT OF GOOGLE'S
MEMORANDUM OF LAW IN OPPOSITION TO PLAINTIFFS' MOTION FOR ORDER
COMPELLING PRODUCTION OF DOCUMENTS WITHHELD AS PRIVILEGED**

I, [REDACTED] pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am [REDACTED] at Google LLC. I have been employed by Google since August 2009 and have held my current position since November 2021.

2. I have reviewed the document identified as GOOG-DOJ-12866023, which is a compilation of notes titled "[REDACTED] Notes 2019 - Sellside" (hereinafter "the Document").

3. I have personal knowledge of the material in the Document because I am the author of the Document.

4. The redacted material on page -029 of the Document relates to discussions about and in furtherance of a project called Project SingleClick. I have personal knowledge of Project SingleClick because I was a member of the team working on Project SingleClick.

5. Project SingleClick was an analysis of potential remedies undertaken because of and in response to active government investigations into, and in anticipation of litigation concerning, Google's ad tech business. The investigations include those by the State of Texas, the Antitrust Division of the United States Department of Justice, and various European authorities. Project SingleClick was supervised by attorneys, including Google's in-house lawyers [REDACTED] ESQ, [REDACTED] ESQ, and [REDACTED] ESQ, among others, and

Google outside counsel, including Axinn, Veltrop & Harkrider and European outside counsel Slaughter & May.

6. I submit this declaration in support of Google's Memorandum of Law in Opposition to Plaintiffs' Motion for Order Compelling Production of Documents Withheld as Privileged in *In Re Google Digital Advertising Antitrust Litigation*, Case No. 21-MD-3010 (PKC) (S.D.N.Y.), filed on November 14, 2022.

7. The contents of this declaration are true and correct to the best of my knowledge, information, and belief, and are based on my personal knowledge of the Document. If called upon as a witness in this action, I could and would testify competently thereto.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 11 day of November, 2022, in New York, NY

